

Michael P. Balaban State Bar No. 9370  
LAW OFFICES OF MICHAEL P. BALABAN  
10726 Del Rudini Street  
Las Vegas, NV 89141  
(702)586-2964  
Fax: (702)586-3023  
E-Mail: [mbalaban@balaban-law.com](mailto:mbalaban@balaban-law.com)

Attorney for Plaintiff

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

BRETT WAGGONER, an Individual

Plaintiff,

vs.

NYE COUNTY; CHRIS ARABIA, in his  
individual and official capacity; LEO  
BLUNDO, in his individual and official  
capacity; DOES I -X; ROE CORPORATIONS  
I -X,

Defendants.

CASE NO. 2:21-cv-01312-APG-EJY

STIPULATION AND ORDER TO EXTEND  
TIME TO RESPOND TO DEFENDANTS  
CHRIS ARABIA AND LEO BLUNDO'S  
PARTIAL MOTION FOR  
RECONSIDERATION (ECF NO. 54) AS TO  
THE COURT'S DECISION TO THEIR  
MOTION FOR SUMMARY JUDGMENT

(First Request)

Pursuant to L.R. I.A. 6-1, 6-2, and L.R. 7-1, Plaintiff BRETT WAGGONER ("Plaintiff")  
and Defendants CHRIS ARABIA and LEO BLUNDO ("Defendants Arabia and Blundo")  
(collectively referred to as the "Parties"), by and through their respective counsel of record, hereby  
stipulate and agree to extend the time for Plaintiff to respond to Defendants Chris Arabia and Leo  
Blundo's Partial Motion for Reconsideration (ECF No. 54) as to the Court's Decision to their

1 Motion for Summary Judgment (ECF No. 52), which is currently due on September 19, 2023, to  
 2 September 25, 2023. The deadline for the Reply will likewise be extended to include six (6)  
 3 additional days to the normal response time. The Parties are requesting this extension due to  
 4 Plaintiff's counsel schedule and workload that includes filing a complaint and responding to  
 5 voluminous discovery requests due the day before and after the opposition would be due in this  
 6 case. This is the Parties' first request to extend the time for Plaintiff to respond to Defendants  
 7 Chris Arabia and Leo Blundo's Partial Motion for Reconsideration as the Court's Decision to their  
 8 Motion for Summary Judgment. This requested extension of time is sought in good faith and not  
 9 for purposes of causing any undue delay.

10 IT IS SO STIPULATED.

11 Dated this 14th day of September, 2023.

12 Dated this 14th day of September, 2023.

13 LAW OFFICES OF MICHAEL P.  
 14 BALABAN

MARQUIS AURBACH

15 /s/ Michael P. Balaban  
 16 Michael P. Balaban, Esq.  
 17 10726 Del Rudini St.  
 Las Vegas, NV 89141

15 /s/ Jennifer L. Micheli  
 16 Brian R. Hardy, Esq.  
 Nevada Bar No. 10068  
 17 Jennifer L. Micheli, Esq.  
 Nevada Bar No. 11210  
 18 10001 Park Run Drive  
 Las Vegas, NV 89145

19 *Attorney for Plaintiff*

20 *Attorneys for Defendants Chris*  
 21 *Arabia and Leo Blundo*

22 IT IS SO ORDERED:

23 DATED: September 18, 2023

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 UNITED STATES DISTRICT JUDGE